

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as
Parents of BRETT LOVELACE, deceased,

Plaintiffs,

Vs.

No. 2:13-cv-02289-SHL-dkv

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

**NOTICE TO TAKE AUDIO VISUAL EVIDENTIARY DEPOSITION OF IRA
LANDSMAN, M.D.**

PLEASE TAKE NOTICE that the defendants, Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D., by and through counsel of record, will, at 5:00 p.m. on Thursday, December 18, 2014, at the law offices of Lewis Thomason, located at 424 Church Street, Suite 2500, Nashville, Tennessee 37219, take the videotaped evidentiary deposition of **IRA LANDSMAN, M.D.** whose testimony is sought regarding all matters not privileged which are relevant to the pending action. Said testimony is to be taken by audiovisual means and stenographically before a duly authorized reporter or some other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed and will be taken pursuant to all applicable provisions of the Federal Rules of Civil Procedure, including but not limited to Rules 26 through 38.

Respectfully submitted,

THE HARDISON LAW FIRM, P.C.

By: s/Jerry O. Potter
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via the Court's electronic filing system upon:

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this 24th day of November, 2014.

s/ Jerry O. Potter
JERRY O. POTTER (#4282)